

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

**COALITION FOR GOOD
GOVERNANCE and DONNA
CURLING,**

Plaintiffs,

v.

**COFFEE COUNTY BOARD OF
ELECTIONS AND REGISTRATION,**

Defendant.

**Civil Action No. 5:23-mc-00001-
LGW-BWC**

**In RE Subpoenas issued by the
United States District Court
For the Northern District of
Georgia, Atlanta Division,
Civil Action File No. 1:17-CV-
2989-AT**

**PLAINTIFF COALITION FOR GOOD GOVERNANCE'S
MOTION TO EXCEED PAGE LIMIT**

Pursuant to Local Rule 7.1, absent permission of the Court, no brief shall exceed 26 pages, inclusive of the certificate of service. Plaintiff Coalition for Good Governance (“CGG”) hereby requests permission of the Court to exceed that limit by five (5) pages. In support of this motion, CGG shows the Court that its description of the background facts that detail the misconduct of CCBOER and its counsel,¹ Hall Booth Smith, PC, required roughly 13 pages. Plaintiffs are seeking sanctions under four different

¹ To be clear, Plaintiffs do not seek sanctions against CCBOER’s lead counsel in this proceeding, Benjamin Perkins or any of the lawyers with the firm of Oliver Maner LLP or the firm of Oliver Maner.

sources of authority: Rules 26 and 37, Fed. R. Civ. P., 28 U.S.C. §1927, and the inherent authority of the Court. Detailing which conduct is sanctionable under each of these authorities requires explanation and citation to authority.

CCBOER has made it clear that it will not consent to an enlargement of the page limit.

Respectfully submitted this 20th day of February, 2024.

/s/ Cary Ichter
CARY ICHTER
Georgia Bar No. 382515
cichter@ichterdavis.com
ICHTER DAVIS LLC
400 Interstate Parkway North, SE
Suite 860
Atlanta, Georgia 30339
(404) 869-7600

and

/s/ Bruce P. Brown
BRUCE P. BROWN
Georgia Bar No. 064460
bbrown@brucepbrownlaw.com
BRUCE P. BROWN LAW LLC
1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 881-0700

Counsel for Coalition for Good Governance

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2024, I caused a copy of the foregoing PLAINTIFF COALITION FOR GOOD GOVERNANCE'S MOTION TO EXCEED PAGE LIMIT to be served on Defendant Coffee County Board of Elections and Registration by sending a pdf. of same via electronic mail to its counsel as follows:

Jennifer Dorminey Herzog, Esq. (jherzog@hallboothsmith.com)

Benjamin M. Perkins, Esq. (bperkins@olivermaner.com)

/s/ Cary Ichter

Cary Ichter

Georgia Bar No. 382515

cichter@ichterdavis.com

ICHTER DAVIS LLC

400 Interstate Parkway North, SE
Suite 860

Atlanta, Georgia 30339

Tel.: 404.869.7600

Fax: 404.602-0037

*Counsel for Coalition for Good
Governance*